

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MICHAEL C. MAYO,)	
Plaintiff,)	
v.)	
)	
LARRY GAVIN, KAREN JONES-)	Case No.: 1:21-cv-04653
HAYES, DAMITA DELITZ, BRENDON)	
LOMBARDI, DIRECTOR MILLER,)	Hon. Judge John J. Tharp, Jr.
OFFICER BUCHANAN, THOMAS)	
DART AND LIEUTENANT DOUGE)	
Defendants.)	
)	

DEFENDANTS' AGREED MOTION FOR ENTRY OF CLAWBACK AGREEMENT

NOW COMES Defendants, LARRY GAVIN, DAMITA DELITZ, BRENDON LOMBARDI, DIRECTOR MILLER, OFFICER BUCHANAN, THOMAS DART and LIEUTENANT DOUGE (collectively “Defendants”), by and through their attorneys Jason E. DeVore and Troy S. Radunsky of DeVore Radunsky LLC, and for this agreed motion for entry of Clawback Agreement, state as follows:

1. This motion is agreed and unopposed.
2. A confidentiality order was entered in this matter on December 20, 2022. Dckt. No. 28.
3. In the course of facilitating production of ESI materials, due to the voluminous nature and the number of privileged materials contained within, the parties became aware of and agreed upon the need for entry of a Clawback Agreement pursuant to Federal Rules of Evidence 26(b)(5)(B) & 502(a) - (b). The parties would like that agreement to be incorporated into the existing Confidentiality Order, Dckt. No. 28. (*A copy of the Parties' Signed Clawback Agreement is attached hereto as Exhibit A.*)

4. The Parties therefore request that the Clawback Agreement be entered and incorporated into the December 20, 2022, Confidentiality Order, Dckt. No. 28.

WHEREFORE, the parties respectfully request that this Honorable Court enter the following order:

1. Granting the Agreed Motion for Entry of Clawback Agreement;
2. The Parties' Clawback Agreement is entered and incorporated into the December 20, 2022, Confidentiality Order, Dckt. No. 28.

Respectfully Submitted,

**TOM DART, COOK COUNTY
SHERIFF'S OFFICE, AND COOK
COUNTY**

By: */s/ Jason E. DeVore*
Jason E. DeVore, One of the Attorneys
for Defendant

DEVORE RADUNSKY LLC
Jason E. DeVore (ARDC # 6242782)
Troy S. Radunsky (ARDC # 6269281)
230 W. Monroe Street, Ste. 230
Chicago, IL 60606
(312) 300-4479 telephone
jdevore@devorerdunsky.com
tradunsky@devorerdunsky.com

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that Defendant's Motion for Extension of Time was filed on March 9, 2023, with the Northern District of Illinois ECF System, serving a copy to all parties.

/s/ Zachary Stillman
Zachary Stillman